

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

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ESTER LELCHOOK, individually and as personal
representative of the Estate of David Martin Lelchook;
MICHAEL LELCHOOK; YAEL LELCHOOK;
ALEXANDER LELCHOOK; AND DORIS
LELCHOOK,

Plaintiffs,

Case No: 1:15-CV-13715 (JGD)

- against -

THE ISLAMIC REPUBLIC OF IRAN; THE CENTRAL
BANK OF THE ISLAMIC REPUBLIC OF IRAN (a/k/a
Bank Markazi Jomhouri Islami Iran); BANK SADERAT
IRAN; AND BANK SADERAT, PLC,

Defendants.

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RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rule 7.3, and to enable District
Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the
undersigned counsel for Bank Saderat PLC certifies that Bank Saderat PLC is a bank
incorporated in England and Wales and is a wholly owned subsidiary of Bank Saderat Iran.

Dated: February 3, 2016

Respectfully submitted,

/s/ William M. Taylor

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Attorney for Defendant Bank Saderat PLC

CERTIFICATE OF SERVICE

I, William M. Taylor, hereby certify that a true and correct copy of Defendant Bank Saderat PLC's Rule 7.1 Disclosure Statement was served electronically via the Court's ECF system upon:

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Attorneys for the plaintiffs

/s/ William M. Taylor
William M. Taylor

February 3, 2016